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16 *Attorneys for Defendants CoreCivic, Inc. and
17 CoreCivic of Tennessee*

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 SANDRA TOCCI, as Special Administrator
21 and Personal Representative of the Estate of
22 Frank E. Tocci, Deceased; and Sandra Tocci,
as Heir and Mother of FRANK E. TOCCI,
Deceased,

Case No. 2:22-cv-02174-GMN-DJA

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

23 Plaintiff,

24 v.

25 CORECIVIC, INC., f/k/a CORRECTIONS
26 CORPORATION OF AMERICA;
27 CORECIVIC OF TENNESSEE, LLC; BRIAN
28 KOEHN, Warden, Nevada Southern Detention
Center; DOE INDIVIDUALS I-XXV; ROE
ENTITIES I-X, inclusive,

Defendants.

29 Pursuant to LR IA 6-1, the parties stipulate to extend the deadline for Defendants
30 CoreCivic & CoreCivic of Tennessee to respond to Plaintiff's Complaint, which was recently
31 removed to this Court from the Fifth Judicial District Court for Nye County on December 30,
32 2022. This is the first stipulation for extension of time for Defendants to respond to Plaintiff's
33

1 Complaint.

2 Defendants' current deadline to file a responsive pleading is January 6, 2023. The
3 parties stipulate to extend this deadline to January 20, 2023, to allow time to meet and confer
4 regarding possible dismissal of some of Plaintiff's claims. This additional time is needed, in
5 part, because Plaintiff's counsel just returned from traveling outside the county. As such, and
6 to streamline this litigation, and avoid unnecessary motion practice and Court intervention,
7 the parties stipulate to extend the deadline for Defendants to respond to Plaintiff's Complaint
8 from January 6 to January 20, 2023. This brief requested extension is made in good faith and
9 not for purposes of delay.

10 DATED this 6th day of January, 2023.
11

12 LAW OFFICES OF MICHAEL GOWDEY

13 STRUCK LOVE BOJANOWSKI & ACEDO, PLC

14 By:/s/ Michael I. Gowdey (w/ permission)

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17 Attorneys for Plaintiff

By: /s/ Ashlee B. Hesman

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20 *Attorneys for Defendants CoreCivic, Inc. and*
21 *CoreCivic of Tennessee*

22 **IT IS SO ORDERED:**

23 
24

UNITED STATES MAGISTRATE JUDGE

25 Dated: 1/9/2023

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Michael I. Gowdey mgowdey@aol.com

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

By: /s/ S. Berry